

Anti-Bribery and Corruption Policy POL-GSK-007

GSK Corporate POL_150091 (11.0)

Why do we have this Policy?

What does this policy cover?

This policy covers our general principles and standards on anti-bribery and corruption (ABAC) and maintenance of business documentation and financial records. It reinforces our zero tolerance towards all forms of corruption and our commitment to maintaining accurate records of our business dealings. This policy aligns with the ABAC laws from the countries where we operate and is based on our corporate values and our ABAC Foundational Principles.

This policy does not stop us doing legitimate business in the context of promoting *products*, executing contracts, exchanging scientific and medical information or paying official published fees for the services or goods provided by governments.

Why should you read this?

Our *Staff* and *third parties* acting on our behalf are required to understand and comply with our ABAC principles and standards, as well as with all relevant international and domestic legislation. All of us are responsible for preventing any instance of bribery or corruption and for reporting any concern or suspicion so we can identify the risks and conduct any required investigations.

If you breach this policy you may also be breaking the law and could face disciplinary action that could lead to you losing your job, being fined and/or sentenced to prison. Personal funds are not used to circumvent this policy.

What do you need to know?

We do not, directly or through a third party, promise, offer, make, authorise, solicit or accept any financial or other advantage, to or from anyone to obtain or retain business, or secure an improper advantage in the conduct of business. This rule applies regardless of whether they are *government officials* or work in a private sector entity.

Financial or other advantage covers anything of value, including cash, gifts, services, job offers, loans, travel expenses, entertainment or hospitality.

We prohibit all facilitation payments as they are bribes. These payments are unofficial, improper, small payments or gifts offered or made to government officials to secure or expedite a routine or necessary action to which we are legally entitled.

ABAC Programme elements:

- Our leadership and managers lead by example, ensuring our Staff and relevant third parties are aware of the ethical significance and critical role of our ABAC principles and standards.

- We perform a comprehensive risk assessment to determine the company's exposure to bribery and corruption risk. The risk assessment is reviewed and updated regularly to reflect changes in our risk profile.
- The ABAC principles established in this policy are developed and supported by a number of periodically reviewed corporate standards which constitute our ABAC controls, policies and procedures ([click here](#)).
- We provide mandatory periodic ABAC training to our Staff and relevant third parties in accordance with their roles, responsibilities and the risks they face.
- We perform risk-based due diligence prior to engaging any third party or undertaking a business development transaction and ensure appropriate contractual clauses and monitoring controls are put in place as described in the relevant written standards.
- Our dedicated **ABAC website** and regular communications ensure ABAC awareness and support are available across the company.

- We are vigilant of any breaches that may occur to our ABAC controls. We respond to problems promptly, investigating root causes and establishing remediating plans that help us improve our ABAC Programme. Those involved in any issue are subject to our disciplinary procedures.
- Independent business monitoring and independent assurance are integral part of our ABAC Programme.
- Relevant risk governance forums provide formal enterprise oversight of our management of the bribery and corruption risk.

Maintenance of business documentation and financial records

All our financial books and records accurately reflect and disclose the business rationale, purpose, substance and legality of all our local and cross-border transactions, payments and expenses.

We do not induce third parties to make incomplete or misleading entries in their records.

If you have concerns

If you hear, see or learn about anything that breaches this policy, you should report it to GSK Legal or Compliance.

If you are unsure whether what you are doing or plan to do comply with this policy, you should immediately contact your line manager in the first instance.

If you want advice on how to interpret and implement anything in this policy you must contact your Legal, **Compliance** or Finance contact responsible for your business unit.



To find your local Speak Up integrity line number or to report online, please visit: www.gsk.com/speakup

Definitions of terms in *italics* in this document can be found in the **GSK Glossary**

Administration

Governance Board Approval:	Risk Oversight & Compliance Council / ABAC Governance Board
Governance Approval Date:	27-OCT-2016
Owner:	Mina Frost, Head, Global Risk Office, GEC
Author:	Gonzalo Guzman, Director, Governance and External Engagement, ABAC CoE
Legal Approver:	Laura Atherton, Assistant General Counsel
History:	This policy supersedes and replaces POL_150091 (10.0) - Anti-Bribery and Corruption Policy POL-GSK-007

Changes since last revision

The main changes are:

- a. Additional elements of the internal control framework, such as monitoring, assurance, responding to problems and discipline and enforcement are specifically linked to the bribery and corruption risk management.
- b. The 'maintenance of business documentation and financial records' section has been reviewed. Specific controls on transactions and payments have been transferred to the new STD_132089: ABAC Standard.

Previous Versions:	22-DEC-2015: POL-GSK-007 v10
	23-DEC-2013: POL-GSK-007 v09
	01-JUL-2012 : POL-GSK-007 v08

See CDMS for Document Effective Date